

Lessons Learned Regarding SAA Hazardous Waste Issues in ESD Lab

7/20/04

Several lessons were learned in conjunction with the SAA hazardous waste issues in an ESD Wet Lab during May/June 2004. They are as follows:

- 1) Waste must bear proper labels that face out towards inspectors in the SAA container. In one case a bottle had handwritten identification information, which was more visible than the proper label (which was turned inward), causing confusion about its date of generation and contents.
- 2) Care must be taken to put the correct year on waste labels; this is more important towards the beginning of the year when experimenters are more likely to put the previous year on labels.
- 3) **All waste must be picked up within 270 days from the date of generation and are subject to serious penalties beyond 365 days. In the future, our lab will take care to have any waste in the SAA picked up on a 90-day cycle to avoid approaching these deadlines too closely.**
- 4) One's JHQ should be reviewed periodically (e.g. every year) and updated as necessary to reflect any changes in one's experimental research. In this case, a postdoc had transitioned from not using hazardous chemicals to using hazardous chemicals in his second year, but had failed to update his JHQ to reflect this. Later, when confronted with an approaching age deadline, the postdoc was unable to arrange pickup as he lacked the proper training and permissions. This created a delay in the pickup process as the postdoc's supervisor was needed to request the pickup, and was away for many weeks on a vacation.
- 5) The hazardous waste disposal online requisition form must be filled out in complete detail and ideally confirmed with Waste Management shortly after sending it, as any shortcomings will result in additional delays in the pickup. In more than one instance Waste Management refused to pick up waste due to incompletely submitted requisition forms. There are some anomalies in the nature of this form that may result in loss of information from the requesting person to the waste pickup group, and this needs correction.